

May 2, 2025

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VIA ECF

The Honorable Kiyo Matsumoto
United States District Judge
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Greebel, S1 15 Cr. 637 (E.D.N.Y.) (KAM)

Dear Judge Matsumoto:

We represent Defendant Evan Greebel. We respectfully write to request a limited stay pending appeal, to which the government consents, of Your Honor's April 10, 2025 Order directing that Mr. Greebel's Stable Value Fund accounts be liquidated and distributed, ECF No. 816, and Your Honor's April 21, 2025 Orders of Garnishment, ECF Nos. 818 and 819.

We respectfully inform the Court that Mr. Greebel filed a Notice of Appeal on April 24, 2025. ECF No. 820. In lieu of potentially unnecessary motion practice, to conserve judicial and party resources, and to prevent irreparable harm to Mr. Greebel pending appeal (the irrecoverable distribution of the funds at issue), we respectfully ask that Your Honor stay the portion of the Court's April 21 Order stating “[t]he Court will order the Clerk of Court to distribute the remainder to Mr. Greebel's victim,” ECF No. 816 at 6, and instead order the Clerk of Court to hold all funds that it receives from the Garnishees in an interest bearing account pending the resolution of Mr. Greebel's appeal. The government consents to this request.

Please find attached a Proposed Order granting that stay and effectuating the parties' agreement to be so ordered.

Respectfully submitted,

/s/ Marc Aaron Takagaki

Marc Aaron Takagaki

cc: All Counsel of Record (*Via ECF*)